

Nicholas W. Sarris, Bar No. 242011
nsarris@jmlaw.com
Brooke C. Bellah, Bar No. 307398
brooke@jmlaw.com
JML LAW
A Professional Law Corporation
5855 Topanga Canyon Blvd., Suite 300
Woodland Hills, CA 91367
Telephone: 818.610.8800
Fax No.: 818.610.3030

Attorneys for Plaintiff SHANIL SHANKAR

Barbara A. Blackburn, Bar No. 253731
bblackburn@littler.com
Christopher T. Benton, Bar No. 325452
cbenton@littler.com
LITTLER MENDELSON P.C.
500 Capitol Mall
Suite 2000
Sacramento, California 95814
Telephone: 916.830.7200
Fax No.: 916.561.0828

Attorneys for Defendant
CENTENE CORPORATION

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SHANIL SHANKAR, an individual,
Plaintiff,

v.

CENTENE CORPORATION, a Delaware
corporation; and DOES 1 through 25,
inclusive,
Defendant.

Case No. 2:21-cv-01224-KJM-CKD

**JOINT STIPULATION TO
CONTINUE DISCOVERY CUT-
OFF AND ORDER THEREON**

Trial Date: None Set
Complaint Filed: June 4, 2021

STIPULATION

Plaintiff SHANIL SHANKAR (“Plaintiff”) and Defendant CENTENE CORPORATION (“Defendant”) (collectively, the “Parties”) through counsel, have met and conferred and hereby stipulate as follows:

WHEREAS, on November 18, 2021, following the Scheduling Conference, the Court issued Minutes for Scheduling Conference [DKT 5], which among other dates, provided for a fact discovery cut-off date of August 15, 2022;

WHEREAS, on November 18, 2021, following the Scheduling Conference, the Court issued Minutes for Scheduling Conference [DKT 5], which among other dates, provided for an expert disclosure date of September 30, 2022;

WHEREAS, on November 18, 2021, following the Scheduling Conference, the Court issued Minutes for Scheduling Conference [DKT 5], which among other dates, provided for a rebuttal expert witnesses date of October 28, 2022;

WHEREAS, on November 18, 2021, following the Scheduling Conference, the Court issued Minutes for Scheduling Conference [DKT 5], which among other dates, provided for an expert discovery cut-off date of November 18, 2022;

WHEREAS, on November 18, 2021, following the Scheduling Conference, the Court issued Minutes for Scheduling Conference [DKT 5], which among other dates, provided for a dispositive motion hearing cut-off date of December 16, 2022;

WHEREAS, the Parties have been actively engaging in the discovery process by exchanging written discovery and are currently meet and conferring regarding supplemental responses to same and have been meeting and conferring regarding taking depositions in this matter;

WHEREAS, following meet and confer efforts, the Parties have agreed that additional time is needed to complete necessary discovery;

1 WHEREAS, the Parties stipulated to continue the current discovery-cut
2 off out by 180 days, making the new discovery cut-off date February 11, 2023;

3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED,
4 by and between the Parties through their respective counsel of record and subject to
5 the Arbitrator's approval, as follows:

6 1. The discovery cut-off deadline of August 15, 2022 (as set forth in
7 the Minutes for Scheduling Order [DKT 5] dated November 18, 2021) is hereby
8 continued to February 11, 2022.

9 2. The deadline to exchange Expert disclosures is hereby continued to
10 March 29, 2023.

11 3. The deadline to submit rebuttal Expert disclosures is hereby
12 continued to April 26, 2023.

13 4. The expert discovery cut-off deadline is hereby continued to May
14 17, 2023.

15 5. The dispositive motion hearing cut-off deadline is hereby
16 continued to June 14, 2023.

17 **IT IS SO STIPULATED.**

18 Dated: August 9, 2022

JML LAW, A Professional Corporation

19 

20
21

NICHOLAS W. SARRIS
BROOKE C. BELLAH

22 Attorneys for Plaintiff
23 SHANIL SHANKAR
24
25
26
27
28

1 Dated: August 9, 2022

LITTLER MENDELSON P.C.

2
3 /s/ Christopher T. Benton

4 BARBARA A. BLACKBURN
CHRISTOPHER T. BENTON

5 Attorneys for Defendant
6 CENTENE CORPORATION
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Having considered the Parties' stipulation, and good cause appearing, therefore orders the following:

1. The discovery cut-off deadline of August 15, 2022 (as set forth in the Minutes for Scheduling Order [DKT 5] dated November 18, 2021) is hereby continued to February 11, 2023.

2. The deadline to exchange expert disclosures is hereby continued to March 29, 2023.

3. The deadline to submit rebuttal expert disclosures is hereby continued to April 26, 2023.

4. The expert discovery cut-off deadline is hereby continued to May 17, 2023.

5. The dispositive motion hearing cut-off deadline is hereby continued to June 23, 2023.¹

IT IS SO ORDERED.

DATED: August 18, 2022.


CHIEF UNITED STATES DISTRICT JUDGE

¹ The parties' identified date of June 14, 2023 is not a viable hearing date.